

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE**

DEBRA W. CARNEY,)
)
Plaintiff,)
)
v.) Civil Action No.: 3:13-cv-00527
)
SUNCREST HEALTHCARE OF)
MIDDLE TENNESSEE, LLC,)
)
Defendant.)

QUICK
This motion
IS GRANTED
in full
9/2/14

**JOINT MOTION FOR LEAVE TO TAKE THE DEPOSITION OF DEFENDANT'S
CORPORATE REPRESENTATIVE OUTSIDE THE DISCOVERY PERIOD
AND SUPPORTING MEMORANDUM**

Plaintiff Deborah Carney and Defendant SunCrest Healthcare of Middle Tennessee, LLC (hereinafter, jointly, "the Parties") move the Court for leave to take the deposition of Defendant's corporate representative outside the discovery period. In support of this motion, the Parties state as follows:

1. The Court entered an Amended Scheduling Order on July 7, 2014. (Doc. No. 30). That Order: (i) set the discovery deadline on August 28, 2014 and (ii) set the dispositive motions deadline on September 22, 2014. *Id.* The trial date is currently not set in this matter. *Id.*
2. The deposition of one of Defendant's corporate representatives, Brenda Dunn, was scheduled to proceed on August 18, 2014. However, Ms. Dunn became ill on the eve of her deposition and the deposition was cancelled.